

***IN THE DISTRICT COURT OF THE UNITED STATES***

***for the Western District of New York***

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**APRIL 2016 GRAND JURY  
(Impaneled 4/22/2016)**

**THE UNITED STATES OF AMERICA      INDICTMENT**

**-vs-**

**TONY IVEY**

**Violation:**

Title 18, United States Code,  
Section 115(a)(1)(B)  
(1 Count)

**COUNT 1  
(Threatening to Kill a Federal Prosecutor)**

**The Grand Jury Charges That:**

On or about June 14, 2016, in Monroe County in the Western District of New York, the defendant, **TONY IVEY**, did threaten to assault and murder a Federal law enforcement officer and an official whose killing would be a crime under Title 18, United States Code, Section 1114 with intent to impede, intimidate and interfere with such law enforcement officer while engaged in the performance of official duties and with intent to retaliate against such law enforcement officer on account of the performance of official duties, in that **TONY IVEY** threatened to kill an Assistant United States Attorney while he was engaged in the performance of his official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

DATED: Rochester, New York, June 28, 2016.

LORETTA E. LYNCH  
ATTORNEY GENERAL

RICHARD S. HARTUNIAN  
United States Attorney for the  
Northern District of New York

BY: /S/ GEOFFREY J.L. BROWN  
Geoffrey J.L. Brown  
Assistant United States Attorney  
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A TRUE BILL:

/s/ Foreperson  
FOREPERSON